

REMARKS

This response is intended as a full and complete response to the Office Action dated March 31, 2006. In view of the following amendments and discussion, the Applicant believes that all claims are in allowable form.

CANCELLATION OF CLAIMS

The Applicant has withdrawn claims 6-7, 9 and 12-18 and cancelled claims 19-22 without prejudice. The Applicant reserves the right to file continuing and/or divisional applications to further prosecute the cancelled subject matter.

IN THE DRAWINGS

The Applicant has amended paragraph [0040] to delete reference numeral 460. Thus, the Applicant believes that the drawings are fully in compliance with 37 CFR 1.121 (d) and respectfully requests the objection be withdrawn.

IN THE SPECIFICATION

The Applicant has amended paragraphs [0018], [0022], [0027], [0030], [0031], [0035] and [0040] in the specification to correct errors as suggested by the Examiner. Accordingly, the Applicant respectfully requests the objection be withdrawn.

CLAIM REJECTIONS**35 U.S.C. §102 Claims 1-2**

Claims 1-2 stand rejected under 35 U.S.C. § 102(a) as being anticipated by United States Patent Publication No. 2003/0075109 published April 24, 2003, to *Arai* (hereinafter referred to as *Arai*). The Applicant respectfully disagrees.

Independent claim 1 recites elements not taught or suggested by *Arai*. *Arai* teaches using lift pins 13 inserted into through holes 12b formed in a substrate support 12. Through holes 12b are formed on a bottom surface 12c of

a pocket portion 12a of the substrate support 12, thereby allowing the lift pins 13 passing through the through holes 12b and contact a bottom surface of the substrate 20. Thus, *Arai* does not teach or suggest at least three elements movably coupled to a substrate support in a spaced-apart relation proximate a perimeter of the substrate support, and a first end of each element adapted to engage an edge of the substrate, as recited by claim 1.

Additionally, the Applicant submits that "at least three elements" recited in claim 1 are not anticipated by "lift pins" of *Arai* as asserted by the Examiner. "The doctrine of claim differentiation can shed light on the proper scope to be afforded a claim limitation, for there is presumed to be a difference in meaning and scope when different words or phrases are used in separate claims." *Toro Co. v. White Consolidated Industries, Inc.*, 199 F3d 1295, 53 USPQ2d 1065, 1070 (Fed. Cir. 1999). In the present application, the "lift pins" recited in claim 14, which depends from claim 1, describe a claim element that is separate and distinct from the "three elements" recited in claim 1. Thus, the "lift pins" of claim 14 and the "at least three elements" of claim 1 must be given different meaning and scope. As such, the Applicant submits that the Examiner may not utilize the lift pins of *Arai* as an anticipating structure for the "at least three elements" recited in claim 1.

Thus, for at least these reasons, the Applicant submits that claims 1-2 are patentable over *Arai*. Accordingly, the Applicant respectfully requests that the rejection be withdrawn and the claims allowed.

35 U.S.C. §103 Claims 3-4

Claims 3-4 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Arai* in view of United States Patent No. 6,104,002 issued August 15, 2000, to *Hirose, et al.* (hereinafter referred to as *Hirose*). The Applicant respectfully disagrees.

Independent claim 1 recites elements not taught or suggested by the combination of *Arai* and *Hirose*. The teaching of *Arai* has been discussed above. *Hirose* teaches forming apertures in a support plate to allow support pins passing therethrough. However, modifying the substrate support as taught by *Arai* with apertures as taught by *Hirose* would not yield at least three elements movably coupled to a substrate support in a spaced-apart relation proximate a perimeter of the substrate support, and a first end of each element adapted to engage an edge of the substrate, as recited by claim 1. As such, a *prima facie* case of obviousness has not been established as the references fail to teach all the elements.

Thus, for at least the reasons discussed above, the Applicant submits that claims 3-4, which depend from claim 1, are patentable over the combination of *Arai* and *Hirose*. Accordingly, the Applicant respectfully requests that the rejection be withdrawn and the claims allowed.

35 U.S.C. §103 Claims 5 and 10-11

Claims 5 and 10-11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable by *Arai* in view of *Hirose* as applied to claim 4 and further in view of European Patent No. 0290218 issued to *Meares, et al.* (hereinafter referred to as *Meares*). The Applicant respectfully disagrees.

Independent claim 1 recites elements not taught or suggested by the combination of *Arai*, *Hirose* and *Meares*. The teachings of *Arai* and *Hirose* have been discussed above. *Meares* teaches using grapping fingers to touch edges of a substrate disposed on a platen to prevent the substrate from slipping out during platen rotation. Grapping fingers coupled in the platen are actuated by a motor mounted exterior of the chamber. (Figure 2). *Meares* does not teach or suggest that a second end of each element positioned below a second side of a substrate support and adapted to engage a bottom of a chamber body when a substrate is in a lowered position, as recited by claim 1. Therefore, combining fingers as taught by *Meares* and apertures taught by *Hirose* into the substrate support as

taught by *Arai* would not yield at least three elements movably coupled to a substrate support in a spaced-apart relation proximate a perimeter of the substrate support, and a first end of each element adapted to engage an edge of the substrate, as recited by claim 1. As such, a *prima facie* case of obviousness has not been established as the references fail to teach or suggest all of the claim elements.

Thus, the Applicant submits that claims 5 and 10-11, all of which directly or indirectly depend from claim 1 are patentable over the combination of *Arai*, *Hirose* and *Meares*. Accordingly, the Applicant respectfully requests that the rejection be withdrawn and the claims allowed.

35 U.S.C. §103 Claim 8

Claim 8 stands rejected under 35 U.S.C. § 103(a) as being unpatentable by *Arai* in view of *Hirose* and further in view of United States Patent Publication No. 2003/0778741 published June 26, 2003, to *Gibson et al.*, (hereinafter referred to as *Gibson*). The Applicant respectfully disagrees.

Independent claim 1 recites elements not taught or suggested by the combination of *Arai*, *Hirose* and *Gibson*. The teachings of *Arai* and *Hirose* have been discussed above. *Gibson* teaches attaching rollers to lift pins to vertically orient the lift pins. However, *Gibson* fails to teach or suggest a modification to *Arai* and *Hirose* that would yield at least three elements movably coupled to a substrate support in a spaced-apart relation proximate a perimeter of the substrate support, and a first end of each element adapted to engage an edge of the substrate, as recited by claim 1. As such, a *prima facie* case of obviousness has not been established as the references fail to teach or suggest all the claim elements.

Thus, for at least the reasons discussed above, the Applicant submits that claim 8 which depends from claim 1 is patentable over the combination of *Arai*, *Hirose* and *Gibson*. Accordingly, the Applicant respectfully requests that the rejection be withdrawn and the claims allowed.

NEW CLAIMS

The Applicant has added new claims 23-25. The Applicant believes that the new claims are fully supported by the specification and are patentable over the references of record. Thus, the Applicant submits that no new matter has been added and respectfully requests allowance of these claims.


CONCLUSION

The Applicant submits that all claims now pending are in condition for allowance. Accordingly, both reconsideration of this application and swift passage to issue are earnestly solicited.

If the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Keith Taboada at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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Date



Keith P. TABOADA
Attorney Reg. No. 45,150
(732) 530-9404

Patterson & Sheridan, LLP
595 Shrewsbury Avenue
Suite 100
Shrewsbury, NJ 07702